



Jonathan P. Vuotto
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Reply to: Morristown

ATTORNEYS AT LAW

October 26, 2012

Via ECF and First Class Mail

Hon. Noel L. Hillman, U.S.D.J.
United States District Court
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

**Re: Cambridge Management Group, LLC v. Baker, et al.
Civil Action No. 12-3577-NLH-AMD**

Dear Judge Hillman:

This firm represents defendants Horace Ruble Baker IV, Sheila Baker, Wilson & Epstein, LLC and Warner R. Wilson, Jr. (collectively, "Defendants") in the above-referenced litigation. On October 18, 2012, we received a letter from the American Arbitration Association in New Jersey (the "AAA") informing us of its determination to not accept new consumer debt collection arbitration filings and to close the arbitration matter initiated by plaintiff, Cambridge Management Group, LLC ("CMG"). A copy of the AAA's letter is enclosed for the Court's reference. The sole relief sought by CMG in this litigation is for an order compelling Defendants to arbitrate the dispute before the AAA. However, since the AAA is no longer taking these types of cases and has closed CMG's matter, the sole relief CMG seeks in this litigation is not available.

Accordingly, on October 25, 2012, Defendants requested that CMG withdraw its complaint in this litigation. A copy of my October 25, 2012 letter is also enclosed for the Court's reference. CMG responded on October 25, 2012, stating that "the AAA will accept these types of actions with a court order," but without providing any basis for this position. A copy of the email from CMG's attorney is enclosed.

Under the circumstances, we respectfully submit that CMG's claim to compel arbitration before the AAA has become moot.

Noel L. Hillman, U.S.D.J.
October 26, 2012
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Please let us know if the Court would like to discuss this matter or whether a motion to dismiss will be required. Thank you.

Respectfully submitted,


Jonathan P. Vuotto

Enclosures

cc: Hon. Ann Marie Donio
Raul J. Sloezen, Esq.
Rudolph V. DeGeorge, II, Esq.

American Arbitration 10/18/2012 5:59:16 PM PAGE 2/003 Fax Server



American Arbitration Association
Dispute Resolution Services Worldwide

phone: 877-495-4185
fax: 877-304-8457

October 18, 2012

Case Filing Services
1101 Laurel Oak Road, Suite 100
Voorhees, NJ 08043
www.adr.org

VIA EMAIL AND FACSIMILE

Raul J. Sloezen, Esq.
Law Offices of Raul J. Sloezen, Esq.
40 Walnut Street
Oakland, NJ 07436

Jonathan Vuotto, Esq.
Riker Danzig Scherer Hyland & Perretti LLP
1 Speedwell Avenue
Headquarters Plaza
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VIA EMAIL

Rudolph V. De George, II, Esq.
Law Offices of Rudolph V. De George II
1221 North Church Street
Suite 301
Moorestown, NJ 08057

Re: 18 513 00813 12
Cambridge Management Group, LLC
VS
Horace Ruble Baker, Warner R. Wilson, Sheila Baker
and Warner & Epstein, LLC
AND
Lifeline Funding, LLC d/b/a US Claims

Dear Parties:

This will acknowledge receipt on July 11, 2012 of a demand for arbitration filed by the business pursuant to an arbitration clause in a customer agreement.

Based on recent public discourse and evaluation of our case experience, the American Arbitration Association has determined not to accept new consumer debt collection arbitration filings. This policy will be in effect until such time as the AAA determines that adequate and broadly acceptable due process protocols specific to these cases are in place. It is our intention to engage in earnest dialogue with a diversity of interest groups on what constitutes a proper protocol framework for these matters. For more detailed information about the AAA's position on debt collection arbitration please see <http://www.adr.org/si.asp?id=5770>.

Accordingly, we are closing this matter and will destroy the filing documents within 30 days. Upon your request, we will return the filing documents to you. Any payments sent by the filing party will be sent under separate cover. The AAA remains available to assist the parties in the use voluntary dispute resolution mechanisms, both binding and non-binding.

We encourage the parties to review these options on our website, www.adr.org, and please feel free to contact me if you wish to take advantage of these services or if you have any questions about our policies.

Sincerely,

/s/ Tara Parvey

Tara Parvey
Director
856-679-4602
ParveyT@adr.org



ATTORNEYS AT LAW

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October 25, 2012

Via Electronic and First Class Mail

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Oakland, New Jersey 07436
rjsloezen@gmail.com

**Re: Cambridge Management Group, LLC v. Baker, et al.
Civil Action No. 12-3577-NLH-AMD**

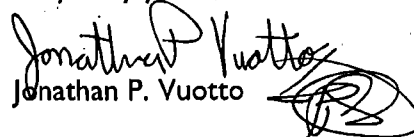
Dear Mr. Sloezen:

This firm represents defendants Horace R. Baker IV, Sheila Baker, Warner R. Wilson, Jr. and Wilson & Epstein, LLC (collectively, "Defendants") in the above-referenced matter. We recently received a letter, dated October 18, 2012, from the American Arbitration Association in New Jersey (the "AAA") informing us of its determination to not accept new consumer debt collection arbitration filings and to close the matter you initiated on behalf of Cambridge Management Group, LLC ("CMG"). In light of the AAA's determination, we request that you discontinue the litigation.

As you know, the sole relief sought by CMG in the litigation is for an order compelling Defendants to arbitrate the dispute before the AAA. Since the AAA is no longer taking these types of cases and has closed your client's matter, the sole relief CMG seeks is not available. We hereby request that you withdraw CMG's complaint. If you do not voluntarily dismiss the case within seven days, we will take appropriate action.

Please let me know if you would like to discuss this matter. Thank you.

Very truly yours,


Jonathan P. Vuotto

cc: Rudolph V. DeGeorge, II, Esq.

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Sheridan, Thomas

From: Raul Sloezen [rjsloezen@gmail.com]
Sent: Thursday, October 25, 2012 7:32 PM
To: Sheridan, Thomas
Cc: rdegeorge1@gmail.com
Subject: Re: Cambridge Management Group, LLC v. Baker, et al.

Mr. Sheridan

Please be advised that the AAA will accept these types of actions with a court order. I am advising you that I shall view any further action as frivolous and will treat it as such. Do as you wish.

Raul J. Sloezen, Esq.

On Thu, Oct 25, 2012 at 6:01 PM, Sheridan, Thomas <tsheridan@riker.com> wrote:

Counsel,

Please see the attached letter from Jon Vuotto. Thank you.

Thomas P Sheridan | Attorney
Riker Danzig Scherer Hyland Perretti LLP
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